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**Green Door Alliance (GDA) Comments
On Phase 2 Preferred Growth Management Concept and Structures Plan**

The Green Door Alliance has commented extensively at an earlier stage in the phase 2 process. These comments still remain relevant to the final Report and will not be repeated

1. We are very disappointed that the final Report deals very indirectly and superficially with many of the thoughtful comments made during the process. There has been no effort to share any such correspondence with those interested in the process or include significant comment as an appendix to the final Report. And there was no forum created during the process where involved parties could debate the approach taken by the GMS to the evaluation. The only more intense forum created was around the detailed design workshop which provided no opportunity to debate the alternatives or raise questions about the basis for choosing the preferred alternative.

The process did not enable interested parties to form any sense for the amount or intensity of any concerns expressed. They have had to largely rely on the Growth Management Study (GMS) team's own summarized interpretation of input received.

2. As the Region of Durham pointed out in its comments, unlike the other options, Option 1 – the Seaton focused option was consistent with the Province's Ministerial Zoning order; consistent with the MOU signed by the City, the Province and the Region which ensured long term protection of the Ag. Preserve; and consistent with the Durham Regional Official Plan and the Region's position to protect the Preserve. The Region went on to ask why then in the choice and application of criteria to compare the various options weren't options other than option 1 downgraded because of this.

The GMS response to such questions seems to be that one of their key drivers was a “made in Pickering solution ... to identify what the community of Pickering sees as the most appropriate scale and location for future growth. As such the study focused on the growth management principles that were developed during the terms of reference preparation rather than current land use designations.”- (appendix B, p-1.)

Yet on the one hand although the GMS dismisses Provincial and Regional objections in favor of a “made in Pickering solution”, great emphasis is placed on the need to meet the Province's PPS requirement to accommodate up to 20 years of growth. To quote from the Report, (B-2), “ The Provincial Policy framework currently in place in Ontario requires that municipalities accommodate 20 years of growth in their planning documents”. Never mind other PPS statements to do with preserving farmland etc. This requirement alone is by far the main argument the study uses to dismiss the Seaton only option. And it is repeated again and again throughout the Report.

It seems quite inconsistent then to dismiss all Provincial and Regional objections to any option requiring development on the Ag. Preserve, because they don't involve a "made in Pickering solution", and then argue that since a Provincial PPS requirement calls for a 20 year supply of land, development in the Ag. Preserve needed to be allowed.

3. According to Regional population forecasts for Pickering, during the period 2021 – 2031 Pickering will increase by some 5,000 residents per year. The GMS recommendations call for a residential population in Seaton of 74,100, some 25,000 more than the GMS indicates could be accommodated in the Seaton only option (49,000).

By pursuing Recommendation 3 and creating an urban envelope that intrudes into the Ag. Preserve and is more than a thousand acres larger than the Seaton only option Pickering will not run out of land until after 2026, whereas if it pursued the Seaton only option it would run out of land some 5 years earlier.

This raises the question then around what Pickering will do 5 years from now if it were able to pursue its strategy to develop in the Ag Preserve. Five years from now it will no longer have a 20 year supply. So applying the GMS logic all Pickering is buying is 5 years. Indeed it is really 4 years because along with population growth there would be employment growth and more employment land would also be required.

So a short four years later Pickering will be faced with the same dilemma. If at that point Pickering were to apply the same logic the GMS is applying today; continue with business as usual and require a 20 year supply, Pickering will have to use more and more of the Ag. Preserve and Seaton lands to develop on. Under this scenario so much for all the rosy visions the GMS are trying to create about retaining countryside and natural areas – much of it will continue to be urbanized a few short years later. If that is the real scenario please level with the public.

If on the other hand the answer is that the urban boundaries associated with the preferred option 3 are to be maintained into the long term future, then what Pickering would be saying is that 4 years from now they will decide they no longer want to maintain a 20 year supply of Greenfield land, they will be finally prepared to bite the bullet and focus more on intensification within existing urban boundaries or consider not accommodating quite the same level of growth.

My question then under this alternative is if 4 years from now Pickering is prepared to adopt a different strategy why can't it do so today? Also what steps are being recommended to ensure these boundaries will indeed be firm?

At any rate the GMS Report is completely silent on this absolutely critical issue. Is preferred option 3 likely to be just the first phase in developing far more of the Ag. Preserve and Seaton or not? And if not why not consider the implications of changing attitudes towards growth and further intensification now rather than putting it off for 4 years. Surely any GMS strategy should provide a game plan for more than 4 years!

After all it was supposed to identify the appropriate scale and location for future growth.

4. Durham Region is currently going through an Official Plan review process. Staff discussion papers indicate Durham has enough land within existing urban growth boundaries to handle growth till sometime between 2026 – 2031. The discussion paper states further that "if the Region were to develop at a higher density of 24.7 uph (10 upa) **consistent with a more mature**

urban state it would not need additional land to accommodate forecasted residential growth for approximately 35 years (i.e. approximately 2036)” (highlight added).

Surely when throughout the GTA there is a growing recognition that growth needs to be accommodated in a different fashion, and given the amount of land already within urban area boundaries in Durham, the GMS recommendation to expand these boundaries into the Ag. Preserve is the wrong way to go. Again this whole area is something the GMS study treats in an extremely superficial manner.

5. The Seaton only proposal calls for a living area of some 2041 acres and an employment area of 1149 acres for a total of some 3190 acres. This is essentially the same amount of acreage the Van Nostrand proposal which won the Seaton design competition in the mid 1990's, was talking of to accommodate up to 90,000 people.

Perhaps the Van Nostrand numbers need some modification. However there has been absolutely no serious dialogue which the public could get involved in that supports the GMS number of 49,000. Quite apart then from intensification in other areas of Pickering and the Region to accommodate further growth, there seems to have been little effort to treat Seaton as a truly model community that could provide leadership in developing a truly compact, mixed use form.

6. As anyone who has produced reports like the GMS study knows, depending on the criteria picked, any alternative could end up being ranked highest. The Region last year commented on what they considered to be GMS approaches to evaluation that to use their words were subjective, did not take into account certain factors that should have been included etc. etc. We and others pointed out some other areas where the criteria seemed subjective, incomplete, self serving etc.

Following are a few more examples out of many that could be mentioned:

- One of the five criteria set up to evaluate environmental integrity was “the ability to achieve natural corridor connections between the Rouge and Duffins.” Unbelievably the Seaton only option – the only option which preserves the entire Ag. Preserve is ranked lowest on this criteria and lower than your preferred option which calls for development of some 1500 acres on the Ag. Preserve! I refer you to comments in our previous submission here. I also refer you to a recent letter from the Chair of the Altona Forest Stewardship Committee to Mayor Ryan which states their concern that the development proposed for the Ag. Preserve ‘would isolate the Forest and lead to its slow destruction.’”

To assume that urbanizing a significant chunk of the Ag. Preserve, as long as one creates a corridor between the Rouge and the Duffin, will have a more positive impact on the Rouge and the Rouge Park, Altona Forest, and other surrounding areas than leaving the entire Preserve as countryside is really stretching things! How can such a conclusion be considered objective!

-There are 5 criteria for respecting cultural heritage. Again the Seaton only option ranks lowest of all the options. A number of these criteria focus on Whitevale. Yet when I talk with Whitevale residents who I've known for many years, many feel one of the very best ways of maintaining their heritage is to protect the Ag. Preserve so a significant amount of rural working countryside is located next to the Town. Yet the GMS don't even think of this rural working countryside as having anything to do with cultural heritage. The GMS assumes if you provide Whitevale a bit more of a buffer within a far more urbanized overall area, cultural heritage will be better

protected. And what do the residents of Cherrywood think of the cultural heritage impact of developing on the Ag. Preserve!

- With respect to Agriculture you do rank the Seaton only option highest but not greatly higher and your comments throughout the Report continue to question the viability of agriculture. The fact that more than 1,000 additional acres will be saved for farming in the Seaton only option isn't even considered a plus in your evaluation!.

-Re the provision of water sewer and roads the alternatives are ranked high low or moderate based not on total but on per capita costs. Take sewer - the Seaton only option you tell us costs \$11.71 million but your preferred option costs \$15.75 million a lot more. However you give your preferred option a high rating because the per capita costs are \$169. And the Seaton only option gets a moderate ranking because its per capita cost is \$181, \$12 more! However if one doesn't read the appendix and just read the body of the Report you don't realize how little the difference is.

You also don't realize the comparison is on a per capita basis. And what has per capita cost got to do with it? What if the 25,000 residents not accommodated in the Seaton only option were accommodated within existing areas either in Pickering or elsewhere in the GTA adjacent to water, sewers, roads public transit etc. In that comparison the Seaton only option might well be better than your preferred option. In other words if you are using per capita comparisons don't you have to make an assumption around where the people would be accommodated if not within the GMS study area? They might drive down per capita costs elsewhere.

Of all the issues we raise, the one I would most like a real answer to is the issue raised in 3 above. What is the GMS recommending be the City position a mere 4 years or so hence, when even if your preferred option is followed, according to your own assumptions Pickering will not have a 20 year supply of land? Do you recommend urbanization of additional areas in Seaton and/or the Ag. Preserve? Or do you recommend a commitment to firm urban boundaries? And if it makes sense to recommend firm boundaries 4 years from now, why not do so now? Without addressing these questions now the GMS is sidestepping its prime mandate - to recommend the extent and location of future growth in Pickering.

In conclusion the Province and all provincial parties support Ag. Preserve preservation. Municipal Affairs Minister John Gerretson has reconfirmed this Provincial commitment in his Feb 10th letter to Mayor Ryan. The Regional Official Plan supports preservation of the Ag. Preserve and the Region has reconfirmed this position. Local, Provincial and even National Environmental Groups overwhelmingly are on record as opposing Ag. Preserve development although many may have not communicated directly to the GMS. .

And we see absolutely nothing in the final flawed GMS Report that will change anyone's mind.

One final point that I cannot leave unsaid.

In 1998 Pickering itself completed its rural study and reconfirmed that the Ag. Preserve should remain in agriculture. In 1999 in order to support a Provincial decision to sell the Ag. Preserve

lands, a Memorandum of understanding (MOU), was executed between the Ontario Realty Corporation (ORC), the Region, and the City of Pickering. Among other things this agreement called for the placing of agricultural easements on parcels larger than 2 hectares – easements which stated these lands should remain in agricultural and conservation uses in perpetuity.

After all of this, after the land had been sold, with much of the mortgage financing supplied by development interests, in 2002 Pickering reversed course and initiated a Growth Management Study funded by over \$ 600,000 by development interests which reopened the issue of development on the Ag. Preserve and surprise surprise is now recommending development on the Ag. Preserve. Land sold by the Province for some \$4,000 an acre a short time ago at agricultural values to private interests could now be worth \$150,000 an acre with development approvals in place and the easement lifted.

Given this history it is hard indeed not to take a very cynical view of the entire GMS process and final report.

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